

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Master File No. 06-CV-1216 (JMR/FLN)

IN RE UNITEDHEALTH GROUP
INCORPORATED SHAREHOLDER
DERIVATIVE LITIGATION

**DECLARATION OF THOMAS
SWIGERT IN SUPPORT OF
DEFENDANTS' MEMORANDUM IN
OPPOSITION TO PLAINTIFFS'
THIRD MOTION TO COMPEL**

I, THOMAS SWIGERT, declare as follows:

1. I am a partner at the law firm of Dorsey & Whitney LLP, attorneys for Defendants Stephen J. Hemsley, William C. Ballard, Jr., Richard T. Burke, James A. Johnson, Thomas H. Kean, Douglas W. Leatherdale, Mary O. Munding, Robert L. Ryan, Donna E. Shalala, Gail R. Wilensky, Arnold H. Kaplan, David P. Koppe, David J. Lubben, Thomas P. McDonough, Jeannine M. Rivet, Robert J. Sheehy, R. Channing Wheeler, and Travers H. Wills. I make this declaration in support of Defendants' Memorandum in Opposition to Lead Plaintiffs' Third Motion to Compel Discovery.
2. Plaintiffs did not meet and confer with Defendants' counsel prior to filing the present motion to compel.
3. Wilmer Cutler Pickering Hale and Dorr LLP ("WilmerHale"), counsel for the Independent Committee of the Board of UnitedHealth Group Incorporated ("United"), did not perform a privilege review of the 4 million documents it collected during the course of its investigation.

4. Since March 14, 2007, when the Court ruled on Defendants motion to dismiss, Defendants have produced 16,344 pages of documents.

5. A team of over 50 Dorsey & Whitney attorneys are engaged in the review of the over 26 million pages reviewed by WilmerHale.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 22, 2007

s/ Thomas Swigert
Thomas Swigert